

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS AND VERIZON CORPORATE  
SERVICES GROUP, INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

**JURY TRIAL DEMANDED**

**DECLARATION OF JAMES S. TSUEI IN SUPPORT OF PLAINTIFF HEADWATER  
RESEARCH LLC'S MOTION TO COMPEL CORE TECHNICAL DOCUMENTS  
REQUIRED UNDER PATENT L.R. 3-4(a)**

I, James S. Tsuei, declare as follows:

1. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Motion to Compel Core Technical Documents Required Under Patent L.R. 3-4(a). I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of a document production bearing Bates number VZN-HW0177231.

3. Attached as Exhibit 2 is a true and correct copy of Headwater’s amended infringement contentions claim chart for U.S. Patent No. 9,198,042, served on January 12, 2024.

4. Attached as Exhibit 3 is a true and correct copy of Headwater’s amended infringement contentions claim chart for U.S. Patent No. 8,924,543, served on January 12, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 21, 2024 at Los Angeles, California.

By: /s/ James S. Tsuei  
James S. Tsuei

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 21st day of August 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ James S. Tsuei  
James S. Tsuei